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UNITED STATES OF AMERICA
14

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 JOHN R. BRINSON, JR.,

18 Petitioner,

19 v.

20 UNITED STATES OF AMERICA,

21 Respondent.
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Nos. 2:17-CR-00404-AB
2:25-CV-02652-AB

GOVERNMENT'S EX PARTE APPLICATION
FOR EXTENSION OF TIME TO RESPOND
TO PETITIONER'S MOTION TO VACATE,
SET ASIDE, OR CORRECT SENTENCE
UNDER 28 U.S.C. § 2255;
DECLARATION OF LAUREN S.
KUPERSMITH

24 Respondent United States of America, by and through its counsel
25 of record, the United States Department of Justice, Child
26 Exploitation and Obscenity Section, and Acting Deputy Chief Lauren
27 S. Kupersmith, and the United States Attorney for the Central
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1 District of California and Assistant United States Attorney Karen I.
2 Meyer, hereby submits this ex parte application for an extension of
3 time for an additional 30 days, until July 28, 2025, to respond to
4 the petition.

5 The ex parte application is based upon the attached Declaration
6 of Lauren S. Kupersmith. The government has not contacted
7 petitioner who is pro se in this matter.

8
9 Dated: June 25, 2025

Respectfully submitted,

10 BILAL A. ESSAYLI
United States Attorney

11 LINDSEY GREER DOTSON
12 Assistant United States Attorney
Chief, Criminal Division
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14 /s/
Lauren S. Kupersmith
15 Acting Deputy Chief, Child
Exploitation & Obscenity Section
16 U.S. Department of Justice, Criminal
Division
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18 KAREN I. MEYER
Assistant United States Attorney

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20 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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DECLARATION OF LAUREN S. KUPERSMITH

I, Lauren S. Kupersmith, declare as follows:

1. I am currently Acting Deputy Chief and Trial Attorney in the Child Exploitation and Obscenity Section (CEOS) in the Criminal Division of the U.S. Department of Justice. I represent the government in this matter, which includes the filing of this ex parte application.

2. On April 3, 2025, the petitioner's motion to vacate, set aside, or correct sentence under 28 U.S.C. § 2255 (Dkt. 1 (the "Petition")) was entered on the criminal docket as Docket Entry 485, along with a 23-page Memorandum in Support and two Affidavits.

3. On May 23, 2025, the Court set a briefing schedule and ordered the government to respond to the Petition by June 27, 2025.

4. While I was counsel of record for the district court proceedings, I was not counsel of record for the appeal, the record of which will need to be reviewed because it impacts the claims at issue in the Petition.

5. Since the Court issued the briefing schedule, there have been significant personnel changes in my office, which involved substantial shifts to my work duties, including a change in title and responsibilities, as well as some unanticipated personal leave from the office, creating difficulties with the ability to respond to the Petition under the original briefing schedule.

6. This application is not made for purposes of delay or tactical advantage, but instead to allow the government adequate time to respond to the Petition.

7. Further, petitioner will not be prejudiced by the extension. A review of the appellate docket for this case reveals

1 that petitioner requested two extensions of time to file his opening
2 brief and a motion to file a late brief, as well as a request for
3 extension of time to file his reply brief, all of which were
4 granted. Petitioner is currently serving a life sentence.

5 I declare under penalty of perjury that the foregoing is true
6 and correct to the best of my knowledge and belief.

7
8
9 Date: June 25, 2025

/s/

Lauren S. Kupersmith
Acting Deputy Chief
Child Exploitation &
Obscenity Section
U.S. Department of Justice,
Criminal Division